



JUSTICIA LABORAL

May 1, 2024

**Via ECF/Pacer**

The Honorable Vera M. Scanlon  
United States Magistrate Judge

**RE: Galisia v. Da Pai Dong, Inc., et. al 1:22-CV-6520-LDH-VMS**

***Status Report***

Dear Judge Scanlon:

Pursuant to this Court's order dated January 30, 2024, following is a status regarding discovery in this case. On February 16, 2024, Plaintiff served Rule 26 disclosures and written discovery requests on Defendants Jianqi Chen and Da Pai Dong, Inc. ("Defendants"). To date, Defendants have not responded to discovery. Counsel for Plaintiff has conferred with counsel for Defendants on multiple occasions regarding the outstanding discovery. Plaintiff's counsel has agreed to multiple extensions; however, on April 16, 2024, Defendants' counsel advised Plaintiff's counsel that Defendants have not been cooperative, and that he may be moving to withdraw as counsel. Plaintiff's counsel agreed to grant Defendants until May 6, 2024 to either respond to discovery, or move to withdraw as counsel. If there is no response to discovery by said date, Plaintiff anticipates that a motion to compel will be necessary, and perhaps a motion to extend discovery.

**Plaintiff**

s/Daniel I. Schlade  
Counsel For Plaintiff  
Justicia Laboral, LLC  
6232 N. Pulaski, #300  
Chicago, IL 60646  
773-550-3775  
dschlade@justicialaboral.com

/s/Kevin K. Tung

Kevin Kerveng Tung, P.C.  
Counsel for Defendants Da Pai Dong, Inc. and Jianqi Chen  
136-20 38<sup>th</sup> Avenue, Suite 3D  
Tel: 718939-4633  
ktung@kktlawfirm.com